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AFFIDAVIT

Brian Mize, being duly sworn, states:

1. I am a Detective with the City of Chesterfield, Missouri Police Department, currently assigned to the Regional Computer Crime Education and Enforcement Group("Enforcement Group"), authorized as a member of the Enforcement Group to investigate federal crimes. I know the information in this Affidavit from my personal observation, and from my review of reports and statements made to me by other federal law enforcement agents.

2. The United States Attorney for the Eastern District of Missouri and the Organized Crime and Racketeering Section of the Department of Justice are investigating a number of illegal Internet sports gambling web sites, including BETonSPORTS.COM, formerly owned and operated by Gary Stephen Kaplan, also known as "Greg Champion" and "G."

BETonSPORTS.COM is an Internet sports book that illegally solicits and accepts wagers on sporting events from gamblers in the United States, including gamblers in the Eastern District of Missouri. BETonSPORTS.COM is headquartered in Costa Rica, has offices in London and Antigua, and possibly the Dominican Republic. BETonSPORTS.COM is owned by BETONSPORTS PLC, a holding company that is publicly traded on the Alternative Investment Market ("AIM") in the United Kingdom.

3. In addition to BETonSPORTS.COM, BETONSPORTS PLC also owns other web sites where gamblers can bet on sporting events, play casino games, or engage in "person to person" (peer-to-peer) wagering. The web sites can be accessed from any computer with an Internet connection, from any location in the United States. They include: BoSGAMING.NET; BoSPOKER.COM; BoSCASINO.COM; Wagermall.com; Wagermall Poker.com; MVP Sportsbook & Casino; Gibraltar Sports; ROCKISLANDSPORTS; ROCKISLANDCASINO;

Millennium Sports; Millpoker.com; Jagbet.com; Jagcasino.com; BETTORSTRUST.COM; BETTORSTRUST-CASINO.COM; Infinity Sports International; Infinity Pokerclub.com; and betabet.

4. According to the prospectus published prior to the initial public offering of BETONSPORTS PLC stock:

BETonSPORTS will be, from Admission, the holding company of the BETonSPORTS group of companies. The Group operates online and telephone sportsbooks and online casinos. The Group has grown rapidly from post-tax profits of just \$0.6 million in the year ended 31 January 2000 to post-tax profits of \$26.9 million in the year ended 31 January 2004 on turnover of approximately \$1.25 billion. Over the same period, the Group's employee base has increased to a total of more than 1,600 staff during its last peak season (running from late August until the end of January). The strong, principally organic, growth enjoyed by the Group in recent years in terms of turnover, profitability and operations has been generated predominantly from betting in the Group's primary, US market, focusing on sports popular in the US. The Group's origins date back to 1995 when its first sportsbook business was established in Aruba, West Indies. In 1997, the sportsbook operations were moved from Aruba to Antigua and an Antiguan sportsbook operating licence was obtained. The Group expanded its operations into Costa Rica in 1998 and the Dominican Republic in 2003. It now has over 135,000 sq ft of operating facilities across these locations. The Group has developed a number of branded sportsbooks which the Directors believe appeal to different types of gambler.

The BETONSPORTS PLC prospectus states that the group of web sites controlled by BETONSPORTS PLC took in wagers amounting to \$1,104,519,000.00 in 2002, \$1,238,459,000.00 in 2003, and \$1,252,328,000.00 in 2004. 98% of this money was taken in as sports wagers from gamblers in the United States, who placed their bets using toll-free telephone services and Internet web sites.

4. BETONSPORTS PLC owns BETonSPORTS.COM; BOS (Antigua) Ltd.; BOS (Costa Rica) S.A.; Infinity Sports International Corporation; Gibraltar Sports Corporation; Mill (Antigua) Ltd.; Millennium Sports Corporation; Sports on the Internet Ltd.; Wagermall.com Inc.;

and Lansford Industries, Inc. A full listing of the domain names associated with BETONSPORTS PLC and registered in the United States is attached as Exhibit A, and herein incorporated by reference. During June and July, 2006, members of the Enforcement Group confirmed that entering any of the domain names listed in Exhibit A cause the browser to load and display a web site associated with BETONSPORTS PLC.

5. BETonSPORTS.COM and the other BETONSPORTS PLC Internet web sites are physically located in San Jose, Costa Rica. To open a wagering account with these web sites, or to place bets via a toll-free telephone service, would-be gamblers are directed to send money to a third party in a third country, usually in Latin America or the Carribean. The money can be sent by check, credit card, or wire transmission. Once the deposit is confirmed, the gambler can use an Internet-connected computer or a toll free telephone number to place bets.

6. Title 18, United States Code, § 1084 states, in pertinent part:

(a) Whoever being engaged in the business of betting or wagering knowingly uses a wire communication facility for the transmission in interstate or foreign commerce of bets or wagers or information assisting in the placing of bets or wagers on any sporting event or contest, or for the transmission of a wire communication which entitles the recipient to receive money or credit as a result of bets or wagers, or for information assisting in the placing of bets or wagers, shall [have committed an offense].

7. According to the prospectus published at the time of the BETONSPORTS PLC initial public offering, the individuals in control of the enterprise, among whom were David Carruthers, the CEO of BETonSPORTS.COM, well knew that U.S. law prohibits the use of interstate and international wire communication facilities to transmit sports wagers and betting information:

The Group¹ has received legal advice that, notwithstanding that the Group's activities may be deemed illegal under US law, there are jurisdictional issues regarding the imposition, adjudication and enforcement of US law against the Group and the Directors, since the Group's relevant operating subsidiaries are not incorporated in the US and do not have any physical presence in the US. The Directors have been advised that, for jurisdictional reasons, it would be difficult for any Group company to be prosecuted on a criminal charge in the US or for a Director to be prosecuted on a criminal charge on his own behalf or on behalf of the company of which he was a Director if he were not physically present in the US.

8. In order to publicize the BETONSPORTS PLC sports gambling web sites and toll-free telephone services, the organization spends millions of dollars on print, radio and television advertising in the United States. In many of these ads, BETONSPORTS PLC states that its sports gambling web sites are "legal and licensed" to operate in the United States. This advertising is fraudulent. None of the BETONSPORTS PLC web sites are licensed to operate bookmaking operations anywhere in the United States. Internet gambling involving interstate or international wire transmissions is not legal anywhere in the United States.

9. On printed advertising, the logo for BETonSPORTS.COM is generally followed by the statement: "World's Largest, Legal and Licensed Sportsbook." One BETonSPORTS.COM flyer mailed out between July 7 and July 11 of 2003 contained the following statement:

Legal Status - Is your current book legal? Do they hold a license anywhere? Does the country your Book is located in even issue licenses? BetonSports.com is the only sportsbook & casino in the world licensed on three continents by the governments of the United Kingdom, Costa Rica and Ireland, ensuring our customers of the legitimacy of our operations.

¹"The Group" consists of BETONSPORTS PLC, its subsidiaries and the Millennium Group, web sites that Gary Kaplan owned with Norman Steinberg, also know as "Tom Miller" and "David Norman." BETONSPORTS PLC purchased the Millennium Group at the time of the IPO.

Similarly, another BETonSPORTS.COM flyer states:

Legal Situation - Is your book legally licensed to operate? BetonSports.com Sportsbook and Casino holds gaming licenses in Antigua, Costa Rica, United Kingdom and Ireland. We are licensed and legal in all jurisdictions we have operations.

10. During 2002 and 2003, BETonSPORTS.COM ran "legal and licensed" ads on radio stations WTEM-AM in Washington, D.C. [between March 7 and March 24, 2002]; WNNZ in Springfield, Massachusetts [between August 18 and August 31, 2003]; WINZ-AM in Miami, Florida [between August 19 and September 2, 2002]; WOFX-AM in Albany, New York [between September 8, 2003 and December 26, 2003]; KTZN in Anchorage, Alaska [between September 11 and September 23, 2003]; WAVZ in New Haven, Connecticut [between September 11 and September 28, 2003]; KEJO-AM in Albany, Oregon [between September 11 and September 28, 2003]; KIST in Santa Barbara, California [between September 11 and September 28, 2003]; and KIIIX in Ft. Collins, Colorado [between September 11 and September 28, 2003].

11. A typical BETonSPORTS.COM radio ad script states:

WHEW!!!! Was that a great weekend of basketball or what??? Bring on the **SWEET SIXTEEN!** Why don't you call **BETONSPORTS.com** at 1 888-996-BETS and get action on every tourney game on the board. There's no bigger rush than when my team beats the spread. What do *you* think all those crazies are yelling about at the sports bar **THE FOOD??**

BETONSPORTS.COM, AT 1-888-998-BETS IS THE WORLD'S LARGEST LEGAL & LICENSED OFFSHORE SPORTSBOOK WITH THE LATEST TOURNEY LINES . . . TOTALS, HALFTIMES, PARLAYS, AND TEASERS.

BETONSPORTS.COM HAS OVER 1,000 OPERATORS WORKING 24/7 TO MAKE SURE ALL YOUR WAGERS ARE DOWN BEFORE TIP-OFF. THEIR MARCH MADNESS PACKAGE INCLUDES UP TO A 20 PERCENT SIGN-UP BONUS FOR ALL NEW AND EXISTING ACCOUNTS WITH

GUARANTEED NEXT DAY PAYOUTS. AND REMEMBER YOU CAN PLAY FOR FREE IN THE CASINO.

**CALL 888-996-B-E-T-S AND GET YOUR BET DOWN TONIGHT ...
THAT'S 888-996-2387. OR LOG ON TO BETONSPORTS.COM**

12. During the 2002 football season, BETonSPORTS.COM used a company called Mobile Promotions to solicit sports wagers in the Eastern District of Missouri and elsewhere. Mobile Promotions bought recreational vehicles with money provided by BETonSPORTS.COM, and covered the vehicles with advertising for BETonSPORTS.COM and MVP, another BETONSPORTS PLC owned and controlled gambling web site. Mobile Promotions employees parked the vehicles at or near stadiums during games, and asked passers by to sign up as gamblers with BETonSPORTS.COM and MVP.

13. During the 2002 football season, undercover police officers placed sports bets with BETonSPORTS.COM from the recreational vehicles operated by Mobile Promotions, while those vehicles were located in Tampa and Jacksonville, Florida. The owners and operators of Mobile Promotions were indicted by the State of Florida on racketeering and bookmaking charges. (*State of Florida v. Monica Lenis and William Hernan Lenis*, Case Number 04-CF-3625. Resolved by misdemeanor pleas on March 24, 2006.) BETonSPORTS.COM was named as an unindicted co-conspirator in that indictment. At the time of the Mobile Promotions arrests, David Carruthers, the CEO of BETonSPORTS.COM told the St. Petersburg Times that the bets they took were completely legal, because they were placed outside the United States. "By using the Internet, [Carruthers] said, gamblers can place bets via Costa Rica, avoiding U.S. laws against gambling."

14. On October 20, 2002, one of the BETonSPORTS.COM recreational vehicles was parked in a lot on the south side of Carr Street, between 2nd and 3rd Streets in St. Louis. Two Special Agents of the Internal Revenue Service Criminal Investigations Division and an FBI Special Agent visited the BETonSPORTS.COM recreational vehicle in an undercover capacity. Individuals wearing clothing with BETonSPORTS.COM logos asked the agents to open accounts with BETonSPORTS.COM, and one of the agents did open an account, using a form and a telephone supplied at the BETonSPORTS.COM recreational vehicle.

15. During September to October, 2003, BETonSPORTS.COM and other BETONSPORTS PLC Internet gambling web sites sent printed advertising from Florida to St. Louis, through the United States Postal System. This material states that BETonSPORTS.COM is the "World's Largest, Legal and Licensed Sportsbook." In one of the BETonSPORTS.COM brochures, "legal and licensed" is repeated four times on the same page. During 2001 and 2002, BETonSPORTS.COM alone paid DME Global Marketing and Fulfillment, approximately \$2,118,883.85 for to print and mail its advertising. One DME invoice for a BETonSPORTS.COM brochure covered costs for mailing 2,000,000 pieces. In July of 2004, one predecessor of BETONSPORTS PLC printed and mailed 135,000 flyers advertising Infinity Sports International (www.betoninternet.com). Immediately under the Infinity logo, the flyer said "Legal and Licensed Sports Wagering." Most of the advertising for Enterprise-controlled web sites contained the term "licensed," and much of it contained the terms "legal and licensed."

16. Advertising for BETONSPORTS PLC controlled web sites refers gamblers to the Offshore Gaming Association ("OSGA") and the International Sports Book Council ("ISBC"). These organizations are advertised as "regulatory" in nature. The web site for the OSGA states:

The Off Shore Gaming Association (OSGA) is an independent "watchdog" agency that monitors the Off Shore Sports Gaming Industry in an effort to provide the public an avenue to find reputable companies to wager with.

We are a professional non-biased third party organization that gives objective opinions, based on your feedback, independent research, phone calls, tips and inside news. We at the Off Shore Gaming Association started this business with the customer in mind.

We are resolved to keeping the philosophy that there are safe places for sports gambling. Because of the climate in the industry today people need to have additional information on offshore sportsbooks and online casinos from an outside source. An educated gambler needs to know where to get information for online gambling.

The ISBC web site states:

We are a professional non-biased third party (**notice there are NO ads or banners**) organization that gives objective opinions, based on your feedback, independent research, phone calls, tips and inside news. We at the ISBC have decided that the online gaming customer needs a reliable watchdog. We are determined to provide the gaming client with 100% confidence that the gaming company he or she chooses is of the highest standards. The climate of the offshore gaming industry has made people need to have additional information on sportsbooks and casinos from an outside source. An educated gambler needs to know where to get this information. Browse our site to choose a safe and reliable company with which to wager.

Both of these web sites are controlled by BETONSPORTS PLC. The "recommended" Internet sports books on the OSGA site include BETonSPORTS.COM, BettorsTrust, Infinity Sports, Millennium, Jaguar, Rock Island, Gibraltar, BetonFantasy, Wagermall and IbetBig, all BETONSPORTS PLC web sites. Every single one of the "certified" Internet sports books on the ISBC site are owned by BETONSPORTS PLC. The promotional material sent to St. Louis included letters from the OSGA and ISBC touting BETonSPORTS.COM, Millennium and other BETONSPORTS PLC web sites.

17. The BETONSPORTS PLC prospectus shows that the use of the OSGA and ISBC “watchdog” web sites to mislead is part of a calculated strategy to deceive the organization’s gambling customers;

The Directors believe that brand reputation is critical to customer acquisition and retention in the online gambling industry. The Group operates through 11 principal sportsbook brands of which the BETonSPORTS brand name is the most significant. Each of these sportsbooks is presented to customers as a stand-alone business, rather than being overtly linked to the others, and each is designed to appeal to a different type of customer. The Directors believe that this multiple brand approach is effective at reducing the impact of customer ‘churn’ (where a customer leaves one sportsbook in favour of another). If a customer ceases to bet with one sportsbook brand, the Group is able to offer another of its brands in order to try to retain the customer within the Group, rather than losing market share to a competitor.

18. From January to July of 2002, undercover FBI agents in St. Louis used interstate/international telephone calls and computer Internet communications to open accounts and place bets with Internet gambling web sites now owned and/or controlled by BETONSPORTS PLC. The undercover agents arranged to make payment through Western Union wire transfers. The undercover agents were instructed to send the money to open wagering accounts to third party recipients, and not directly to the gambling web site.

19. FBI and IRS investigators have traced Western Union transfers back to eighteen individual gamblers. From 2001 to 2004, these individuals sent at least \$2.5 million dollars to Internet sportsbooks, a majority of the money going to BETonSPORTS.COM. More than \$40,000 of this amount came from two gamblers in the Eastern District of Missouri.

20. BETONSPORTS PLC and its predecessors have claimed that its operations in the United States do not violate U.S. law, because BETONSPORTS PLC conducts its gambling business in Costa Rica, and other locations outside the United States, and not in the United States

itself. For example in October of 2002, when the BETonSPORTS.COM recreational vehicle was in Tampa, and Mobile Promotions employees were arrested, David Carruthers told the St. Petersburg Times that the bets they took were completely legal, because they were placed outside the United States. "By using the Internet, [Carruthers] said, gamblers can place bets via Costa Rica, avoiding U.S. laws against gambling."

21. According to the last Annual Report (covering the 53 weeks up to February 6, 2005) for BETONSPORTS PLC, the company's sportsbooks took 2.9 million bets by phone, and 7 million bets over the Internet. The average phone bet was \$201, and the average Internet bet was \$72 (average sports bet, \$109). American football represented 39%, basketball 36% and baseball 22% (97% total) of all the bets placed.

22. On September 4, 2005, the following statements were posted on the BETonSPORTS.COM web site, domain name, bosplc.com:

About Us

The companies within the group operate out of regulated and licensed jurisdictions . . . BETonSPORTS works actively with governments to promote the position that the future of the industry is best served by regulation to ensure that customers can be confident in a reliable and secure betting forum.

Marketing

BETonSPORTS enjoys a virtuous circle wherein the ability of a successful company in this sector to generate strong cashflow provides solid financial resources to build brand awareness and acquire and retain customers. . . . In advance of the 2005 season, a major online push has broadened the BETonSPORTS marketing mix. This initiative has seen a significant investment in banner ads and keyword purchase, an intense focus on search engine optimization and frenetic development of an enhanced affiliate programme to drive traffic through third party sites.

business development

While cementing BETonSPORTS position as a market leader in the key North American region through increased marketing, affiliate programmes and customer retention/cross selling initiatives, BETonSPORTS is always looking to expand its global reach by seizing opportunities in all territories.

23. The BETonSPORTS PLC web site provides a downloadable “snapshot” of the organization. On September 4, 2005, this “snapshot” stated:

Strategy

In 2004 the global spend on internet gaming and wagering was estimated to be in excess of \$8.2 billion with 50% of this emanating from the United States. Although the industry has experienced dramatic growth to achieve this value, it represents a little over 3% of the total global gaming market. That revenue share is predicted to grow to 8% in the next four years

Underpinning all BETonSPORTS development is the constant priority to expand both revenue and market share in the core United States market

24. On September 5, 2005, a story regarding Internet gambling appeared in The Miami Herald. This story, titled “International Gamble Pays Off,” stated that BETONSPORT PLC “is just one offshore company that’s cashing in big on the popularity of Internet gambling,” and that U.S. companies could not compete because Internet gambling is illegal in the United States. The Chief Operating Officer of BETONSPORTS PLC is quoted as saying “[t]his is good, because currently the U.S. gambling market is a gray area from a regulatory standpoint.”

25. On October 21, 2005, BETonSPORTS issued a press release titled, “BETonSPORTS Hits the Road for Tailgating Trail.” One version of the press release that appeared on the Internet stated:

The flagship brand of BETonSPORTS PLC announced the schedule for its luxury buses that will hit football hotbeds across the country this fall.

The buses, which will be making appearances every week at key college and pro football games around America, take tailgating to a new level and allow fans to learn more about the BETonSPORTS brand. . . .

The accompanying schedule covers 40 dates between October 22, 2005 and February 5, 2006.

An "About BETonSPORTS" section states, "BETonSPORTS is one of the largest licensed and publicly-traded online wagering companies in the world. Operated by BETonSPORTS plc, BETonSPORTS is licensed in Europe and the Caribbean with offices in London, Costa Rica, Antigua, the Dominican Republic, Guatemala, Mexico and Malaysia."

26. On July 12, 2006, members of the Enforcement Group accessed the sportsbook web sites BetonSports.com, Jagbet.com (Jaguar Sportsbook) and several others owned and operated by BETONSPORTS PLC. The following statements were displayed on those web sites:

BetonSports.com: Betonsports continues to redefine the image of offshore gaming operations. We now occupy over 110,000 sq ft of prime office space in San Jose Cost Rica and our 24/7 operation is staffed by over 2,000 motivated and bilingual customer services. We are one of the World's Largest, Legal & Licensed Sportsbook.

MVPBets.com: MVPbets.com is an industry leader in providing a safe, legal and secure place to wager on football, basketball, baseball, hockey, NASCAR, boxing and more.... Whatever your sporting event might be we got a line for you to wager on, from any location in the world.

MVPSportsbook.com: MVP Sportsbook is an offshore sportsbook licensed by the government of Costa Rica to service sports gaming enthusiasts world-wide.

- Jagbet.com: **Is Jaguar Sports a legal company?**
Jaguar Sports International is a part of the BETonSPORTS PLC group. A publicly listed company in the London Stock Exchange.
Is it legal to wager at Jaguar Sports?
Yes, however you must be at least 18 to place wagers according to Costa Rican law. Jaguar Sports will not honor wagers placed by minors, or college/professional athletes. We remind you to check with your local authorities on the gaming regulations in your area.
- Players Super Book: Founded in 1998 with three generations of sports gaming experience, Players Super Book was promptly licensed and regulated by the local government in Europe and the Caribbean to provide sports and casino wagering world-wide.
- V-Wager.com: Here at V-Wager.com you will find the best 2006 NBA Basketball wagering online entertainment, with the standard for reliable, accessible, and secure gaming on the Internet. To ensure complete legality, all transactions and wagers shall be considered originating from Costa Rica and licensed in Europe and the Caribbean.
- Infinitypokerclub.com,
Millpoker.com: Is playing poke with Millennium Sports legal?
Yes. Millennium Sports holds multiple licenses, among them one issued by the government of Costa Rica and one issued by the government of Barbuda & Antigua. MillPoker is a division of Millennium Sports a company owned and operated by World pay Solutions Ltd. Minshull House 67 Wellington Rd North Stockport, Cheshire SK4-2LP, UK and part of a Publicly Traded Company Listed on AIM, a Market Operated by The London Stock Exchange PLC. Customers should check the laws and regulations in their own country and comply with them.

27. Based on documents published by BETONSPORTS PLC, during the time period from January of 2002 through February 6, 2005, BETONSPORTS PLC and its predecessors took in bets totaling \$4.6 billion dollars. Ten percent [the "vig," or charge made on a losing bet] of that amount is \$460,000,000.00.

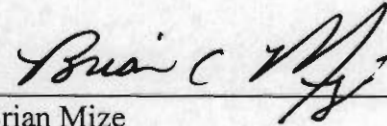
28. On June 1, 2006, the Federal Grand Jury for the Eastern District of Missouri indicted BETONSPORTS PLC, Gary Stephen Kaplan, David Carruthers, the owners and operators of Mobile Promotions, and others on charges of racketeering conspiracy. A copy of the Indictment in that case is attached as Exhibit B, herein incorporated by reference.

29. As of July 12, 2006, BETONSPORTS PLC maintained 71 toll-free telephone numbers used to take wagers on sports and sporting events, and to transmit wagering information in interstate and foreign commerce. These telephone numbers and their service providers are listed in Exhibit C attached, and herein incorporated by reference.

30. As of July 12, 2006, Internet web sites operated by the defendant and accessible from the United States offered Neteller, Neteller Instacash, Firepay, Electronic Money Transfer, Visa/Mastercard, Citadel Commerce, Cashiers Check and Bankwire as mechanisms for funding a wagering account, and receiving payouts. The defendant's primary Internet sportsbook, BETonSPORTS.COM, stated that payouts requested by cashiers checks would be delivered to the gambler by courier service.

31. These facts demonstrate that BETONSPORTS PLC is conducting illegal activities in the United States, and is engaged in an ongoing scheme to defraud citizens of the United States, including those who reside in the Eastern District of Missouri.

32. Further your affiant sayeth not.



Brian Mize
Detective
Regional Computer Crime
Education and Enforcement Group

Subscribed and sworn before me this 17th
day of July, 2006.

Notary Public

